

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**DAVID ZAITZEFF,**

**Plaintiff,**

**v.**

**PEREGRINE FINANCIAL GROUP, INC. and  
JOSEPH PETER SLAGA,**

**Defendants.**

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**No. 08-cv-04053**

**Hon. Charles R. Norgle**

**DEFENDANTS' MOTION FOR EXTENSION OF TIME  
TO FILE ANSWER TO COMPLAINT**

**NOW COME** Defendants Peregrine Financial Group, Inc. ("PFG") and Joseph Peter Slaga ("Slaga"), by their undersigned attorneys, and move this Court for an Order granting them an extension of time in which to file their Answer and, in support thereof, state the following:

1. This matter was previously pending before the U.S. District Court for the Central District of California. Defendants moved to dismiss for improper venue or, in the alternative, for a transfer of venue to this Court. The Central District for California granted Defendants' motion for a transfer of venue. This matter is now pending before the Northern District of Illinois.

2. Defendants request an extension of time until September 30, 2008 to file their Answer to the Complaint. This request is made because of arbitration and appellate commitments of the undersigned in other matters. The Complaint contains sixteen causes of action and one hundred forty eight numbered paragraphs.

3. On August 1, 2008, the parties appeared by counsel for their initial status conference before this Court at which time Judge Bucklo recused herself from the case. Afterward, the undersigned met and conferred with J. Bryan Wood of Stowell & Friedman, counsel for Plaintiff in this matter, and requested a sixty-day extension of time to file the Answer

to the Complaint due to the undersigned's commitments. In response, Mr. Wood was cordial but noncommittal and said he would pass the request along. Later that day, the undersigned was contacted by one Michael Tracy, a California attorney who had represented the Plaintiff while the matter was pending in the Central District of California, but who is not admitted in the Northern District of Illinois and who has not filed an appearance with this Court at which time, among other things, Mr. Tracy demanded that Defendants file an Answer be filed within one week and stated that no extensions will be granted for any reason.

4. No schedule yet has been set in this case, nor has any initial status conference been held; therefore, granting the relief requested by Defendants will not unduly prejudice the Plaintiff.

WHEREFORE, Defendants Peregrine Financial Group, Inc. and Joseph Peter Slaga respectfully request that the court grant them until September 30, 2008 to file their Answer to the Complaint and granting such other relief as may be just and proper.

PEREGRINE FINANCIAL GROUP, INC.  
and JOSEPH PETER SLAGA

By: \_\_\_\_\_s/Christopher L. Gallinari\_\_\_\_\_  
One of Their Attorneys

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